

# EXHIBIT 32

JOSEPH WANAGEL  
5/21/2021

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

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HUNTERS CAPITAL, LLC, et al., )  
                                    )  
Plaintiffs,                  )  
                                    )  
vs.                             ) No. 20-cv-00983-TSZ  
                                    )  
CITY OF SEATTLE,             )  
                                    )  
Defendant.                  )

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Zoom Video Deposition Upon Oral Examination

of

JOSEPH WANAGEL

30(b)6 Olive ST Apartments

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DATE: Friday, May 21, 2021

REPORTED BY: Mindy L. Suurs, CSR No. 2195

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1 accessing your buildings?

2 A. There are certainly times when they told me that  
3 there was garbage in the streets, march goings on, things  
4 on fire. Were there times that they probably would have  
5 had to crash into something or drive on the sidewalk or  
6 find some alternative route to get to the building? Yes.  
7 Sidewalk access -- would it have been possible to get  
8 there? Yes. Would they have been at risk, I mean of  
9 physical harm, I would say likely.

10 I guess it's really a matter of like, okay, so if  
11 there's a bunch of people yelling "kill cops" and there's a  
12 dumpster on fire, are they -- is that -- is that physically  
13 stopping you from getting somewhere?

14 Q. Right. So what I'm talking about is an actual  
15 physical barrier that would have prevented access to your  
16 building, and it sounds like that did not occur, to your  
17 knowledge; right?

18 MR. PHILLIPS: Objection to form.

19 A. I guess the answer actual physical -- there were  
20 certainly times when there was trash in the street, so if  
21 you consider that a physical barrier, the answer would be  
22 yes -- like dumpsters and garbage cans, like that was a  
23 normal thing for them to do -- is throw dumpsters and  
24 garbage cans in the streets, which would -- you would  
25 physically have to move something to get to the building.

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1 REPORTER'S CERTIFICATE  
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3 I, Mindy L. Suurs, the undersigned Certified Court  
4 Reporter, pursuant to RCW 5.28.010, authorized to  
administer oaths and affirmations in and for the State of  
Washington, do hereby certify:

6 That the foregoing testimony of JOSEPH WANAGEL  
was given before me at the time and place stated therein  
7 and thereafter was transcribed under my direction;

8 That the sworn testimony and/or proceedings were by me  
stenographically recorded and transcribed under my  
9 supervision, to the best of my ability;

10 That the foregoing transcript contains a full, true,  
and accurate record of all the sworn testimony and/or  
11 proceedings given and occurring at the time and place  
stated in the transcript;

12 That the witness, before examination, was by me duly  
sworn to testify the truth, the whole truth, and nothing  
but the truth;

14 That I am not a relative, employee, attorney, or  
15 counsel of any party to this action or relative or employee  
of any such attorney or counsel and that I am not  
16 financially interested in the said action or the outcome  
thereof;

17  
18 DATE: May 28, 2021  
19  
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21  
22  
23



*Mindy L. Suurs*

24 Mindy L. Suurs  
Certified Court Reporter #2195  
25

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1 S I G N A T U R E

2

3 I declare that I have read my within deposition,  
4 taken on Friday, May 21, 2021, and the same is true and  
5 correct save and except for changes and/or corrections, if  
6 any, as indicated by me on the "CORRECTIONS" flyleaf page  
7 hereof.

8 Signed in Bothell, Washington,  
9 this 25th day of June, 2021.

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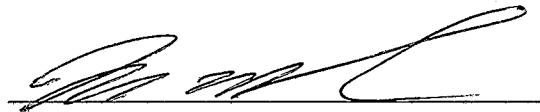
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17 JOSEPH WANAGEL

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